IN THE UNITED STATES DISTRICT COURT FOR THE STATE OF DELAWARE

PRISCILLA BORGES,

Plaintiff,

Case No. 1:25-cv-00541-UNA

v.

TRANSUNION LLC, EQUIFAX INFORMATION SERVICES LLC, and EXPERIAN INFORMATION SOLUTIONS INC.,

Defendants.

<u>DEFENDANT EQUIFAX INFORMATION SERVICES LLC'S MOTION TO JOIN</u> <u>TRANS UNION'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT</u>

Defendant Equifax Information Services LLC ("Equifax"), by and through its attorneys, hereby moves this Honorable Court to join Defendants Trans Union, LLC ("Trans Union") in its Motion to Dismiss Plaintiff's Complaint ("Motion to Dismiss") and supporting memorandum, filed on May 9, 2025. Doc. Nos. 12-13.

The allegations Plaintiff raises against Trans Union in her Complaint are the same as the allegations raised against Equifax. *See* Plaintiff's Complaint. Plaintiff's claims against Equifax fail for the same reasons set forth in Trans Union's Motion to Dismiss. Thus, Equifax adopts all arguments made by Trans Union.

The interests of judicial economy and efficiency warrant granting the relief sought herein since the relief requested in Trans Union's pending Motion to Dismiss would likewise extend to Equifax. To avoid potential piecemeal or partial litigation, Equifax moves to join Trans Union's Motion to Dismiss. In the event the Court denies Equifax's request, Equifax requests seven (7) days from the Court's ruling on this motion to file its own motion to dismiss

WHEREFORE, Equifax respectfully requests this Honorable Court grant this motion, and to join Trans Union's Motion to Dismiss.

Dated: May 19, 2025 Respectfully submitted,

CLARK HILL PLC

By: /s/ Karen Grivner

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Counsel for Defendant Equifax Information Services LLC

CERTIFICATE OF SERVICE

I hereby certify that on May 19, 2025, I presented the foregoing DEFENDANT EQUIFAX INFORMATION SERVICES LLC'S MOTION TO JOIN TRANS UNION'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record. A copy has also been sent via U.S. Mail to the following:

Priscilla Borges, *plaintiff pro se* 112 Miners Lane Newark, Delaware 19713 Telephone: (302) 377-1145

/s/ Karen Grivner
Karen Grivner
Counsel for Defendant
Equifax Information Services LLC